

FILED
IN CLERKS OFFICE

2021 DEC 15 PM 12:48

United States District Court

District of Massachusetts

U.S. DISTRICT COURT
DISTRICT OF MASS.

Marco Antonio Perez-Ocampo,
Petitioner

v.

Plymouth County Sheriff Department,
Respondent

MOTION FOR HABEAS CORPUS

Here comes petitioner pro se with his motion of habeas corpus under 28 U.S.C section 2241 of the United States Constitution. The petitioner asks this court to liberally construe his motion as a pro se litigant.

My name is Marco Antonio Perez-Ocampo. I am writing this letter because I believe my rights have been violated. I have been transferred from multiple facilities. I am care level 4 medical because of my condition. I am diabetic and have lumbar degenerative disc disease, L3/4, L4/5 and L5/S1 with previous left L3/4 and L4/5 discectomies. I am now in Plymouth County Correctional Facility (PCCF). I have been there since July 17th 2021. I was brought here in a cargo van when I was supposed to be transported in a handicap vehicle. I was in so much pain when I got out of the van. I have medical records stating my status of my disc disease yet they still stuck me in a cargo van. When I got here, I was placed on 24-hour surveillance and they took away my medication (Gabapentin 1200mg 3 times a day). I have MRI images on how bad my back is and yet they only gave me 15mg of Melixican and 600mg of Tylenol for the pain, which did not help. I need my daily medication. On July 20th 2021 and August 4th 2021, the doctor Kenneth Boyd, MD put two requests for urgent neurosurgeon/spinal consult after 85 days. On October 15th 2021, they took me to Boston Medical Centre for the appointment but Plymouth County staff forgot to send my medical records when I went for the appointment. On October 18th 2021, I put in a sick call request to speak to the doctor here at Plymouth County and they told me that they lost all of my medical records or misplaced them. I have no idea why but till this day October 26th 2021, I have not seen a neurosurgeon concerning my issue. I would like to know if I could receive help on this matter. I already put in an official complaint with

Immigration and Customs Enforcement (ICE). I want to know if there is something more I could do because till this day, I am still not being treated right and being denied my medication. I am sending copies of all my medical/sick request/MRI of my back. I would really like help on this matter. My name is Marco Antonio Perez-Ocampo my ID at Plymouth County is 79651. If someone could kindly reach out to me it would be very much appreciated. Thank You.

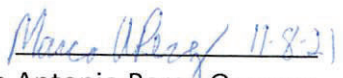
In a case of emergency, this facility has no other exit suitable for me, as the emergency exit is a stairway without handicap ramp access. There are only 2 exit stairway only. They have 3 exit doors in this C3 unit, then that will be a lie, the one upstairs, can only be accessed through the stairs going up and the door to that is constantly locked. It is not an exit to an open space rather it is an exit to another locked door to a different stairway.

There has been consistent sick call requests that I have put in to alert the medical staff at each facility I have been to. I have record of them. I have been denied medical assistance when I was in extreme pain. There was always some type of excuse that was said to me. I have been transferred nine times from facility to facility and all failed to get me the medical assistance I need to go to the neurosurgeon. All records of my lawsuits and complaints explaining everything in detail are in the packet that I will be sending along with this letter:

1. BOP Health Records Classification
2. DHS Complaint
3. Letters to ICE Asst. Field Office Director for Custody Review
4. All requests for medical intervention to ICE
5. MRI records and images
6. Notice of Custody Determination
7. Medical call slips
8. Complaints and motions of violation of civil rights

I am asking for legal help. I need representation if possible. If someone could kindly reach out to me I would be very much grateful. Petitioner prays that this court orders his release from ICE custody.

Respectfully Submitted,


Marco Antonio Perez-Ocampo